

From: **Paul Simeone** <prs4272@gmail.com>
Date: Fri, Sep 2, 2011 at 2:09 PM
Subject: Caouette-Simeone CR process
To: mikeg.acton@gmail.com
Cc: mike_gowing@earthlink.net

As current Tenant of the Caouette-Simeone land we are forwarding the attached concerns we have about the CR development process.

We are also requesting a copy of the final, complete CR draft as it will be submitted to the Selectmen before it is submitted.

We are particularly concerned about elements of the CR including any cover letter that would seek to micromanage how the farm is operated. Specifically there is an effort to require that the farm be managed organically. We are concerned that such a requirement:

1. Does not address environmental or health concerns. Organic production is a philosophy that naturally-derived inputs are preferable to synthetic ones. This is not a science-based approach to reducing such risks.
2. May severely limit the viability of farms operating on this land. Less than 5% of the farmland in Massachusetts is under organic production largely because of such limitations.

The Committee developing the CR closed the opportunity for public comment prior to the finalization of the document. We do not feel we were adequately able to raise our concerns in this forum. For this reason we would request a half hour to make a presentation to the Board of Selectmen on issues pertinent to the proposed restrictions. Presenters would include me, representatives of the Littleton Agricultural Commission, and an expert from the Massachusetts Farm Bureau.

In the meantime, the CR draft version on the town website refers to the removal of fencing at the end of each growing season. Installation and removal of the electric fencing are labor-intensive and expensive tasks and removal of the fencing is not necessary to allow safe movement of people and wildlife on the property. Please reconsider this requirement.

Paul Simeone
Stonefield Farm

Attachment: Leasee re CR

Caouette-Simeone Land Conservation Restrictions

We have been attending the Caouette-Simeone Land Conservation Restriction Committee (CRC) meetings since the June 14, 2011 public input session when we became aware, among other issues, of the need to educate the public about farming in general and Stonefield Farm's operations in particular. Much of what we were hearing, though well-intentioned, was not based on knowledge or direct experience, but suppositions or interpretation.

Many towns in Massachusetts, including surrounding towns, have established town Agriculture Commissions or Committees¹ and there are examples of Farming Bylaws (see Concord Town Bylaws, Farming Bylaw) that go beyond the state Right to Farm bylaws. Many issues being discussed by the CRC would have been addressed and resolved in the town-wide public process leading to such a bylaw. We are all at a disadvantage because Acton does not have such a commission or farming bylaw.

We have previously forwarded comments to the CRC, but based on Committee discussions (not having access to working CR drafts) and the ongoing role of Stonefield Farm as the current Tenant of the Caouette-Simeone property, we would like to make the following observations:

- We continue to be surprised by the apparent hostility to conventional farming and the implication that Stonefield Farm does not care about the public and the environment. Throughout its existence Stonefield Farm has valued and been very fortunate in the friendliness and support of its customers and neighbors, and has always discussed and resolved any concerns.
- We would like to see a reality check on the assumption that organic practices are completely safe and risk-free. Some of the products approved for organic use (OMRI² listed) such as copper hydroxide, which has an REI³ of 24 hrs, require care in handling and are, in fact, chemicals. What is meant by sustainable practices is also unclear. Pyrethrins are also OMRI listed and, though not persistent, are highly toxic to fish.
- We do not think the CRC is the appropriate group to be creating new, local agricultural standards or regulations. There are state and federal standards and regulations already in place that address public safety, posting warning signs, defined buffer zones, etc. Citing these in the CR should be sufficient for current and future management.
- If, as has been proposed, organic processes are indicated as preferred, management of the CR and any future lease would require that **certified** organic farming be followed. The existing definition of organic is based on certification and anything else would be without guidelines or standards. Conversion to certified organic operations would require leaving fields fallow for three years.

¹ In Concord certified organic and conventional farmers work together to maintain a healthy environment for farming in the town. Organic or conventional is a choice made by the individual farmer.

² Organic Materials Review Institute

³ Restricted Entry Interval

- Assumptions are being made about prior farming methods and historical use of the Caouette-Simeone land. Photographic evidence shows open pasture in the 1800s. This usage continued until the land was purchased by Tony Simeone in the late 1950s and developed for vegetable crops. Research of historical records would be required to determine how the land was farmed and how productive it was before the 1800s.
- The economic viability of farming in general is always challenging. Limiting the farming on Caouette-Simeone land to address current concerns held by some puts the future use of this farmland at risk. **We do not see the need to prescribe future farming methods.** Though the Caouette-Simeone fields offer a valuable supplement to Stonefield Farm's operations, for example supporting appropriate rotation of crops, the tillable acreage is small. The property purchased variously reported as 10-14 acres has less than 5 acres currently under cultivation. Future leases need to work within these limits. Stonefield Farm itself contains buffers, wetlands, and undeveloped acreage leaving habitat for wildlife. Less than half the acreage is tilled. Plowing around and monitoring the killdeer's nest in the Triangle Field is a regular springtime practice. Migrating Canada geese stop over in open space left around drainage ditches and on irrigation ponds. Fox patrol the edges of the fields and the wild turkeys move through. Farming is hard work but always requires a balance and concern for the land. Conventional farming works for Stonefield Farm, anything else is unproven.

Paul Simeone
Stonefield Farm